

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

<b>DELSIE E. BROOKENS,</b>	)	
	)	
<b>PLAINTIFF,</b>	)	
	)	<b>C.A. No. 07-387(JJF)</b>
<b>v.</b>	)	
	)	
<b>GENERAL MOTORS CORPORATION, a Delaware</b>	)	
<b>Corporation, GENERAL MOTORS CORPORATION,</b>	)	
<b>Plan Administrator, and GM HOURLY-RATE</b>	)	
<b>EMPLOYEES PENSION PLAN, an employee pension</b>	)	
<b>benefit plan,</b>	)	
<b>DEFENDANTS.</b>	)	

**MOTION TO REQUEST EXTENTION OF TIME FOR  
PLAINTIFF TO FILE MOTION FOR SUMMARY JUDGMENT**

COMES NOW, Plaintiff Delsie E. Brookens, through counsel, and Moves this Court for a 30-day Extension of Time in which Plaintiff is to file Motion for Summary Judgment in the above action beyond the Court Order date of March 31, 2008. In support of this Request, Plaintiff states that her Counsel has been unable to contact his client as to needs of further information in support of said motion, and, in addition, has had further time constraints due to other court requirements, thereby restricting his availability to formulate an adequate analysis of the Affirmative Defenses of Defendants' Answer, thereby necessitating this Motion. Counsel have discussed same and have agreed as to Plaintiff submitting an extension of time request to the Court.

WHEREFORE, Plaintiff therefore requests an extension of time to April 30, 2008, in which to file a Motion for Summary Judgment.

/s/ JOHN M. STULL  
John M. Stull, (Bar #568)  
Attorney for Plaintiff  
3 Mill Road, Ste #306A  
P. O. Box 1947  
Wilmington, DE 19899

Dated: March 31, 2008

IT IS SO ORDERED THIS

DAY OF April, 2008

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U. S. District JUDGE

### **CERTIFICATE OF SERVICE**

I, John M. Stull, counsel for plaintiff herein, do certify that I did on March 31, 2008, submit the within request to the Court for Extension of Time to file a Motion for Summary Judgment via e-mail, and did send a copy of same to counsel for Defendants via U. S. Mail, postage prepaid,

\s\ JOHN M. STULL  
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Attorney for Delsie E. Brookens

DATED: March 31, 2008